1 2 3 4 5 6 7 8	Craig A. Hansen (CA Bar No. 209622) Email: craig@hansenlawfirm.net Stephen C. Holmes (CA Bar No. 200727) Email: steve@hansenlawfirm.net Philip E. Yeager (CA Bar No. 265939) Email: phil@hansenlawfirm.net Collin D. Greene (CA Bar No. 326548) Email: collin@hansenlawfirm.net HANSEN LAW FIRM, P.C. 75 E. Santa Clara Street, Suite 1250 San Jose, CA 95113-1837 Telephone: (408) 715 7980 Facsimile: (408) 715 7001  Attorneys for Plaintiffs	
9	Temujin Labs Inc., a Delaware corporation, a Temujin Labs Inc., a Cayman Islands corpora	
10	UNITED STATES DISTRICT COURT	
11	NORTHERN DISTRICT OF CALIFORNIA	
12		
13	TEMUJIN LABS INC., a Delaware corporation, and TEMUJIN LABS INC., a	Case No.: 4:21-cv-09152-JST
14 15	Cayman Islands corporation,  Plaintiffs,	DECLARATION OF CRAIG A. HANSEN IN SUPPORT OF PLAINTIFFS' MOTION FOR ENLARGEMENT OF TIME UNDER
16	v.	FEDERAL RULE OF CIVIL PROCEDURE 6(b)
17	TRANSLUCENCE RESEARCH, INC., a	[N.D. Cal. Civil Code Local Rule 6-3]
18	Delaware corporation, BENJAMIN FISCH, CHARLES LU, BENEDIKT	Courtroom: Courtroom 6, 2 <sup>nd</sup> Floor
19	BÜNZ, NATHAN MCCARTY, FERNANDO KRELL, PHILIPPE CAMACHO CORTINA, BINYI CHEN,	Judge: Hon. Jon S. Tigar  Complaint Filed: November 24, 2021
20	AND LUOYUAN (ALEX) XIONG, and DOES 1-20, inclusive,	Complaint Piled. November 24, 2021
21	Defendants.	
22		
23		
24		
25		
26		
27		
28		
	.l	

- 1. I am the managing attorney of the Hansen Law Firm P.C. ("HLF"), counsel for Plaintiffs Temujin Labs, Inc., a Cayman Islands corporation ("Temujin Cayman"), and Temujin Labs, Inc., a Delaware corporation ("Temujin DE") (collectively, "Plaintiffs"). I have personal knowledge of the matters stated in this Declaration and, if called upon as a witness, would competently testify to them.
- 2. HLF retained Pacific Coast Legal Services ("PCLS") to help HLF effect service upon the defendants in this action. The named defendants in this action are Translucence Research, Inc. ("Translucence"), Benjamin Fisch, Charles Lu, Benedikt Bünz, Nathan McCarty, Fernando Krell, Philippe Camacho Cortina, Binyi Chen, and Louyuan (Alex) Xiong. HLF asked PCLS to run skip traces on the individual defendants residing in the U.S.
- 3. Attached as Exhibit 1 is a true and correct copy of the Declaration of Service filed in this action as ECF No. 12 regarding service upon Translucence.
- 4. Attached as Exhibit 2 is a true and correct copy of the Proof of Service filed in this action as ECF No. 14 regarding service upon Nathan McCarty.
- 5. Attached as Exhibit 3 is a true and correct copy of the Proof of Service filed in this action as ECF No. 14-1 regarding service upon Benjamin Fisch.
- 6. Charles Lu and Benjamin Fisch are defendants and cross-complainants in another action filed by Plaintiffs in Santa Clara County Superior Court, Case No. 20CV372622, *Temujin Labs Inc. v. Ariel Abittan, Benjamin Fisch, Charles Lu, and Does 1-10* (the "State Court Action"). Counsel for Charles Lu and Benjamin Fisch recently filed an *ex parte* application relating to service upon two individual cross-defendants of Lu and Fisch's cross-complaint in the State Court Action represented by the same counsel, HLF. Through subsequent discussions related to that *ex parte* application, counsel for Lu and HLF entered into a stipulation whereby counsel for Lu would accept service for Lu in this action, and HLF would accept service for the individual cross-defendants in the State Court Action. A true and correct copy of that stipulation, entitled "Stipulation and [Proposed] Order Regarding Service of and Response to Cross-Complaint," is attached hereto as Exhibit 4.

1	7. Attached as Exhibit 5 is a true and correct copy of the Proof of Service filed in this	
2	action as ECF No. 16 regarding service upon Charles Lu through his counsel, Eddie Han of the	
3	law firm Paul Hastings.	
4	8. Attached as Exhibit 6 are true and correct copies of Declarations of Due Diligence	
5	regarding attempts to find and serve Benedikt Bünz.	
6	9. Attached as Exhibit 7 are true and correct copies of Declarations of Due Diligence	
7	regarding attempts to find and serve Binyi Chen.	
8	10. I do not believe that Plaintiffs' request for an enlargement of time to perfect	
9	service will have a material effect on the schedule of the case. I further believe that Plaintiffs will	
10	suffer substantial harm or prejudice if this request for an enlargement of time to perfect service is	
11	not granted.	
12		
13	I declare under penalty of perjury under the laws of the United State of America that the	
14	foregoing statements are true and correct to the best of my knowledge and belief, and that this	
15	Declaration was signed in San Jose, California on February 17, 2022.	
16		
17		
18	Craig A. Hansen	
19		
20		
21		
22		
23		
24		
25		
26		
27		
28		